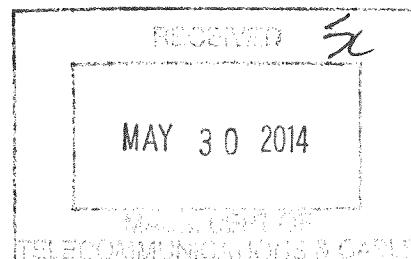


May 29, 2014

Paul C. Besozzi  
202-457-5292  
pbsozzi@pattonboggs.com

**BY ELECTRONIC FILING AND FEDERAL EXPRESS**

Ms. Catrice C. Williams  
Secretary  
Department of Telecommunications and Cable  
1000 Washington Street, 8<sup>th</sup> Floor, Suite 820  
Boston, MA 02118



**Re: Petition of Recipients of Collect Calls from Prisoners at Correctional Institutions in Massachusetts Seeking Relief from the Unjust and Unreasonable Cost of such Calls – D.T.C. 11-16 – Supplement To Responses And Objections Of Securus Technologies, Inc. To Petitioners' First Set Of Interrogatories and Requests For Production Of Documents**

Dear Ms. Williams:

In accordance with the Procedural Order, dated February 27, 2014, as amended by the Order On Motion For Extension Of Time, dated April 18, 2014 (collectively "Order"), enclosed for filing is an original of a Supplement To Responses And Objections Of Securus Technologies, Inc. To Petitioners' First Set Of Interrogatories And Requests For Production Of Documents ("Supplement").

Per Section II.A. of the Order, the Supplement is being electronically filed with the original and requisite copies prescribed by Section II.A.3. of the Order being sent by overnight delivery.

An extra copy of this transmittal letter is enclosed to be stamped-in or otherwise marked as received and returned in the enclosed envelope.

Sincerely yours,

Paul C. Besozzi

cc: Service List for D.T.C. 11-16

**Before The  
COMMONWEALTH OF MASSACHUSETTS  
DEPARTMENT OF TELECOMMUNICATIONS AND CABLE**

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**Petition of Recipients of Collect Calls  
from Prisoners at Correctional Institutions  
in Massachusetts Seeking Relief from the Unjust  
and Unreasonable Cost of such Calls**

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) **D.T.C. 11-16**  
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**SUPPLEMENT TO RESPONSES AND OBJECTIONS OF SECURUS TECHNOLOGIES,  
INC. TO PETITIONERS' FIRST SET OF INTERROGATORIES AND REQUESTS FOR  
PRODUCTION OF DOCUMENTS**

In accordance with the Procedural Order, dated February 27, 2014, as amended by the Order On Motion For Extension Of Time, dated April 18, 2014,<sup>1</sup> Securus Technologies, Inc. ("Securus" or "Company"), acting through undersigned counsel, hereby supplements its April 29, 2014 Responses And Objections To Petitioners First Set Of Interrogatories and First Set Of Production Of Documents as set forth below.

**I. RESPONSES AND OBJECTIONS TO PETITIONERS' FIRST SET OF  
INTERROGATORIES**

**A. Securus Response To Petitioners' Interrogatory No. 12**

Securus restates and incorporates all of the objections originally set forth in its Responses and Objections to this Interrogatory. Without waiving any of those objections, Securus supplements its prior response as follows: The Company's policy with respect to refunds from AdvanceConnect accounts is also publicly available on the Company's web site at <https://securustech.net/ac-terms-and-conditions>. Further, the process for obtaining refunds is also

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<sup>1</sup> D.T.C. 11-16, *Petition of Recipients of Collect Calls from Prisoners at Correctional Institutions in Massachusetts Seeking Relief from the Unjust and Unreasonable Cost of such Calls*, Procedural Order, February 27, 2014, as amended by the Order On Motion For Extension Of Time, dated April 18, 2014 (collectively, *Procedural Order*).

publicly available on the Company's web site at <http://apps.securustech.net/dyk.asp> under the frequently asked question "My inmate got out of jail. How do I get a refund on my Advance Connect Account?"

**B. Securus Response To Petitioners' Interrogatory No. 16**

Securus restates and incorporates all of the objections originally set forth in its Responses and Objections to this Interrogatory. Without waiving any of those objections, Securus supplements its prior response as follows: The last sentence of the response is corrected to read: "As noted in Exhibit 7 to the Response, Securus also conducts customer service surveys."

**II. REPONSES AND OBJECTIONS TO PETITIONERS FIRST SET OF REQUESTS FOR PRODUCTION OF DOCUMENTS**

**A. Securus Response To Petitioners' Document Request No. 2**

Securus restates and incorporates all of the objections originally set forth in its Responses and Objections to this Document Request. Without waiving any of those objections, Securus supplements its prior response as follows: With respect to the responses addressed to Mr. Stallings, these responses are to the complaints originated from the Better Business Bureau of Metropolitan Dallas. While not created by Securus in connection with the complaints for which Securus previously provided its responses, Securus is also providing the related, underlying complaint documents that it has, redacted consistent with the previously-provided Securus responses.

**B. Securus Response To Petitioners' Document Request No. 4**

Securus restates and incorporates all of the objections originally set forth in its Responses and Objections to this Document Request. Without waiving any of those objections, Securus supplements its prior response as follows: Securus's policy and procedures concerning disconnected calls is publicly-available on line through the Company's Consumer Solutions Center at <http://apps.securustech.net/consumersolutions.asp>. It is also addressed in the Company's Friends and Family Telephone Service Guide separately provided.

**C. Securus Response To Petitioners' Document Request No. 11**

Securus provides its original response with corrected title as Attachment A.

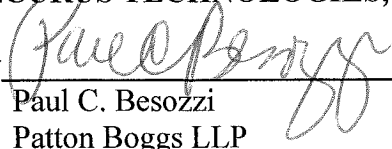
**D. Bates Stamped Responsive Documents**

Securus previously provided documents without Bates Stamp numbers as required by the Procedural Order. Securus is providing a new set of the responsive documents, supplemented as reflected herein, with Bates Stamp numbers.

Respectfully submitted,

**SECURUS TECHNOLOGIES, INC.**

By

  
Paul C. Besozzi

Patton Boggs LLP

2550 M Street NW

Washington DC 20037

202-457-5292

Dated: May 29, 2014

# **ATTACHMENT**

## **A**

**Before The  
COMMONWEALTH OF MASSACHUSETTS  
DEPARTMENT OF TELECOMMUNICATIONS AND CABLE**

**D.T.C. 11-16**

**Responses And Objections Of Securus Technologies, Inc.: Petitioners' First Set Of  
Requests For Production Of Documents**

**Respondent: Curtis J. Hopfinger**

**Title: Director – Government and Regulatory Affairs**

**REQUESTER:** Petitioners

**DATED:** March 10, 2014

**ITEM: PETITIONERS' DOCUMENT REQUEST NO. 11** - Any and all documents, reports or analyses that track quality performance by facility, region or state that would cover Massachusetts for the years 2011, 2012, 2013, and 2014. These documents might track things like trouble reports, quantities of dropped calls, network outages, and other related quality assurance issues you might measure or track.

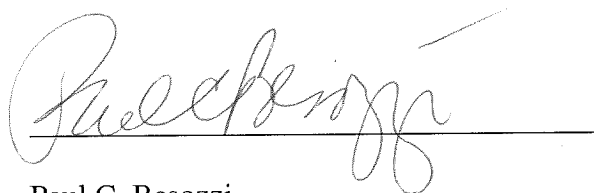
**REPLY:** Securus repeats and incorporates its General Objections, and specifically General Objections Nos. 1 and 5. More specifically, Securus objects to the foregoing request on the grounds that it is overly broad, unduly burdensome and ambiguous. Securus further objects on the grounds that it seeks information neither relevant to the limited issues involved in this investigation nor reasonably calculated to lead to the discovery of admissible evidence because it is outside the scope of the limited issues involved in this investigation, specifically seeking information far beyond the limited quality of service matters at issue in this investigation and includes information unrelated to the Commonwealth of Massachusetts.

### **CERTIFICATE OF SERVICE**

I, Paul C. Besozzi, hereby certify that on this 29th day of April, 2014, I did serve, by Federal Express or first class mail, postage prepaid or by electronic mail a copy of the foregoing "Supplement To Responses And Objections Of Securus Technologies, Inc. To Petitioners' First Set Of Interrogatories And Requests For Production Of Documents" and related documents on the parties listed on the Service List below issued by the Department:

Kalun Lee Hearing Officer Department of Telecommunications and Cable 1000 Washington Street, 8th Floor, Suite 820 Boston MA 02118-6500 <a href="mailto:kalun.lee@state.ma.us">kalun.lee@state.ma.us</a> Via Federal Express and Electronic Mail	Karlen Reed Director, Competition Division Department of Telecommunications and Cable 1000 Washington Street, 8th Floor, Suite 820 Boston MA 02118-6500 <a href="mailto:karlen.reed@state.ma.us">karlen.reed@state.ma.us</a> Via Federal Express and Electronic Mail
Paul Abbott General Counsel Department of Telecommunications and Cable 1000 Washington Street, 8th Floor, Suite 820 Boston MA 02118-6500 <a href="mailto:paul.abbott@state.ma.us">paul.abbott@state.ma.us</a> Via Federal Express and Electronic Mail	Joseph Tiernan Competition Division Department of Telecommunications and Cable 1000 Washington Street, 8th Floor, Suite 820 Boston MA 02118-6500 <a href="mailto:joseph.tiernan@state.ma.us">joseph.tiernan@state.ma.us</a> Via Federal Express and Electronic Mail
James Pingeon, Esq. Bonita Tenneriello, Esq. Elizabeth Matos, Esq. Alphonse Kamanzi Prisoners' Legal Services, Inc. 10 Winthrop Square, 3rd Floor Boston, MA 02110 <a href="mailto:jpingeon@plsma.org">jpingeon@plsma.org</a> <a href="mailto:btenneriello@plsma.org">btenneriello@plsma.org</a> <a href="mailto:lmatos@plsma.org">lmatos@plsma.org</a> <a href="mailto:akamanzi@plsma.org">akamanzi@plsma.org</a> Via Electronic and U.S. Mail	Patricia Garin, Esq. Stern, Shapiro, Weisberg & Garin 90 Canal St., 5th Floor Boston, MA 02114 <a href="mailto:pgarin@sswg.com">pgarin@sswg.com</a> Via Electronic and U.S. Mail

<p>Catrice C. Williams  Secretary  Department of Telecommunications and Cable  1000 Washington Street, 8th Floor, Suite 820  Boston MA 02118-6500  <a href="mailto:catrice.williams@state.ma.us">catrice.williams@state.ma.us</a>  <a href="mailto:dtc.efiling@state.ma.us">dtc.efiling@state.ma.us</a>  Via Federal Express and Electronic Mail</p>	<p>Ken Dawson  VP Contracts &amp; Regulatory  Inmate Calling Solutions, LLC d/b/a  ICSolutions  2200 Danbury St.  San Antonio, TX 78217  <a href="mailto:kdawson@icsolutions.com">kdawson@icsolutions.com</a>  Via Electronic and U.S. Mail</p>
<p>Curtis Hopfinger  Director, Regulatory and Government Affairs  Securus Technologies, Inc.  14651 Dallas Parkway, Ste. 600  Dallas, TX 75254  <a href="mailto:chopfinger@csecurstech.net">chopfinger@csecurstech.net</a>  Via Electronic and U.S. Mail</p>	<p>Chèrie Kiser  Angela F. Collins  Cahill Gordon &amp; Reindel LLP  1990 K Street NW  Suite 950  Washington DC 20006  <a href="mailto:ckiser@cgrdc.com">ckiser@cgrdc.com</a>  <a href="mailto:acollins@cgrdc.com">acollins@cgrdc.com</a>  Via Electronic and U.S. Mail</p>



Paul C. Besozzi